

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

GREGORY THOMPSON)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 1:09-cv-1113-GBL/TRJ
)	
WACKENHUT SERVICES, INC., et al.)	
)	
Defendants.)	
)	

OBJECTION TO NOTICE OF DEPOSITION

COMES NOW the Defendant, Wackenhut Services, Incorporated, by counsel, and objects to Plaintiff's Notice of Jeremy Harman's May 27, 2010, deposition, and as grounds therefor, states as follows:

1. The Notice (Exhibit A) references that the deposition is being taken pursuant to a court order. No such order has been issued.

2. The subject deposition was supposed to be a Fed. R. Civ. P. 30(b)(6) examination concerning certain subjects, pre-designated by Plaintiff, as identified in his attached correspondence, Exhibit B. Without waiving its rights as to the discoverability of the enumerated items, in response to the same, Defendant unofficially designated Mr. Harman as its corporate designee as to items 1-3.¹ However the subject Notice is not set out as relating to a Fed. R. Civ. P. 30(b)(6) deposition. To the extent that Plaintiff is requesting Mr. Harman's testimony in any other capacity or relating to any other subject matter not set forth in attached Exhibit B, Defendant objects, especially since

¹ Item 4 is not an area of "designation," as such. Item 5 is beyond the ken of any representative off this defendant. It is not an agency of or affiliated with DISA and is not suitable subject matter for any representative of the defendant.

reasonable/11 days' notice of the same has not been given. Fed. R. Civ. P. 30(b)(6) and Local Rule 30(H).

3. The Notice contains a request that certain documents be produced. The request is overly broad and vague, and, inter alia, clearly seeks the production of privileged materials. All materials to which a privilege is not claimed have previously been produced, as was a comprehensive privilege log. Defendant therefore objects to the production of the requested documents again, stands on its prior relevant discovery responses, and for the aforesaid reasons, does not anticipate producing the requested materials at deposition.

Respectfully submitted,

DOMBROFF GILMORE JAQUES & FRENCH

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of May, 2010, I will electronically file the foregoing Objection with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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And I hereby certify that I will mail the document by U.S. mail to the following non-filing user:

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/s/

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